

1 RENE L. VALLADARES
Federal Public Defender
2 State Bar No. 11479
PAUL D. RIDDLE
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax

6 Attorney for Daniel Pilgrim

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 DANIEL PILGRIM, JR.,

14 Defendant.

Case No. 2:14-CR-119-JCM-CWH

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(First Request)

15
16 IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, Acting
17 United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, counsel for
18 the United States of America, and Rene L. Valladares, Federal Public Defender, and Paul D.
19 Riddle, Assistant Federal Public Defender, counsel for Daniel Pilgrim, Jr., that the Revocation
20 Hearing currently scheduled on July 20, 2018, be vacated and continued to a date and time
21 convenient to the Court, but no sooner than sixty (60) days.

22 This Stipulation is entered into for the following reasons:

23 1. Mr. Pilgrim has a pending petition alleging a violation of his federal supervision.
24 The alleged violation is a new crime which is currently pending in state court. The parties
25 wish to continue the hearing regarding Mr. Pilgrim's revocation of supervision in order to
26 determine whether it would be appropriate to reach a global resolution as to the new charge
and the alleged violation.

1 2. Since the state proceeding is inexorably linked to the allegations contained in
2 the petition, the parties agree to the need for continuance.

3 3. Therefore, a 60 day continuance is requested to allow Mr. Pilgrim sufficient time
4 to determine whether a global resolution can be reached.

5 4. Defendant is incarcerated, but does not object to a continuance.

6 5. Additionally, denial of this request for continuance could result in a miscarriage
7 of justice.

8 RENE L. VALLADARES
9 Federal Public Defender

 DAYLE ELIESON
 United States Attorney

10
11 By /s/ Paul D. Riddle_____

12 PAUL D. RIDDLE
13 Assistant Federal Public Defender

 By /s/ Daniel J. Cowhig_____

 DANIEL J. COWHIG
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 DANIEL PILGRIM, JR.,

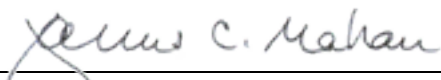
7 Defendant.

Case No. 2:14-CR-119-JCM-CWH

ORDER

9
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled for
11 Friday July 20, 2018 at 10:00 a.m., be vacated and continued to October 1, 2018 at the hour
12 of 10:30 a.m. ; or to a time and date convenient to the court.

13 DATED this 20th day of July, 2018.

14 
15 _____
16 UNITED STATES MAGISTRATE JUDGE